

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JANE DOE ONE AND TWO,

Plaintiffs,

v.

VENIAMIN GONIKMAN, et al

Defendants

Case No. 13-14057

Hon. Marianne Battani

Ma.

ANSWER TO COMPLAINT AND AFFIRMATIVE DEFENSES

John Sands and Rose Talent Agency, Inc. (“Defendants”) state:

1. The Defendants neither admit nor deny the allegations contained in paragraph 1 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

2. The Defendants neither admit nor deny the allegations contained in paragraph 2 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

3. The Defendants deny that they recruited, enticed and/or transported the Plaintiffs from the Ukraine to the United States because it is not true. The Defendants neither admit nor deny the remaining allegations contained in paragraph 3 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

4. The Defendants admit only that Rose Talent acted as a talent agent for the Plaintiffs and helped them obtain licenses and assisted finding them a location for work. The Defendants further admit that they received a commission from the club that employed the Plaintiffs in the amount of \$35.00 per week, which is standard in this industry. The Defendants

deny the remaining allegations contained in paragraph 4 of the Complaint because they are not true.

5. The Defendants neither admit nor deny the allegations contained in paragraph 5 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

6. The Defendants deny receiving any benefit from the exploitation, forced sexual services and forced labor of the Plaintiffs because it is not true. The Defendants neither admit nor deny the remaining allegations contained in paragraph 6 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

7. The Defendants neither admit nor deny the allegations contained in paragraph 7 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

JURISDICTION AND VENUE

8. The Defendants neither admit nor deny the allegations contained in paragraph 8 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

9. The Defendants neither admit nor deny the allegations contained in paragraph 9 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

10. The Defendants neither admit nor deny the allegations contained in paragraph 10 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

11. The Defendants admit that Defendant Sands resides in the Detroit area. The Defendants neither admit nor deny the remaining allegations contained in paragraph 11 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

12. The Defendants admit that Defendant Rose is a Michigan corporation with its principal place of business in the Detroit area. The Defendants neither admit nor deny the allegations contained in paragraph 12 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

13. The Defendants neither admit nor deny the allegations contained in paragraph 13 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

14. The Defendants neither admit nor deny the allegations contained in paragraph 14 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

PARTIES

15. The Defendants neither admit nor deny the allegations contained in paragraph 15 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

16. The Defendants neither admit nor deny the allegations contained in paragraph 16 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

17. The Defendants neither admit nor deny the allegations contained in paragraph 17 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

18. The Defendants neither admit nor deny the allegations contained in paragraph 18 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

19. The Defendants admit that Sands is a citizen of the United States and that he owns Rose Talent. The Defendants neither admit nor deny the allegations contained in paragraph 19 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

20. The Defendants admit the allegations contained in paragraph 20 of the Complaint.

21. The Defendants neither admit nor deny the allegations contained in paragraph 21 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

FACTUAL ALLEGATIONS

22. The Defendants neither admit nor deny the allegations contained in paragraph 22 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

23. The Defendants neither admit nor deny the allegations contained in paragraph 23 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

24. The Defendants deny the allegations contained in paragraph 24 of the Complaint because they are not true.

25. The Defendants admit that Sands owns Rose Talent. The Defendants neither admit nor deny the remaining allegations contained in paragraph 25 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

26. The Defendants neither admit nor deny the allegations contained in paragraph 26 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

27. The Defendants deny having a “longstanding business relationship” with the Beauty Search Partners because it is not true. The Beauty Search Partners found Sands and his company on the internet. The Defendants admit the remaining allegations contained in paragraph 27 of the Complaint.

28. The Defendants admit that they heard from Beauty Search Partners in or around 2003. The Defendants deny that they were “involved” in any scheme to traffic foreign women because it is not true. The Defendants neither admit nor deny the allegations contained in paragraph 28 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

29. The Defendants neither admit nor deny the allegations contained in paragraph 29 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

30. The Defendants admit that Defendant Sands visited the Ukraine with Beauty Search Partners. The Defendants deny the remaining allegations contained in paragraph 30 of the Complaint because they are not true.

31. The Defendants admit that Sands was in Ukraine around 2004, but denies it was at the “request” of Beauty Search Partners. Rather, the owners of Beauty Search Partners invited

him to go to the Ukraine for a vacation. The Defendants admit the remaining allegations contained in paragraph 31 of the Complaint.

32. The Defendants neither admit nor deny the allegations contained in paragraph 32 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

33. The Defendants neither admit nor deny the allegations contained in paragraph 33 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

34. The Defendants neither admit nor deny the allegations contained in paragraph 34 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

35. The Defendants neither admit nor deny the allegations contained in paragraph 35 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

36. The Defendants deny the allegations contained in paragraph 36 of the Complaint because they are not true.

37. The Defendants deny that allegations contained in paragraph 37 of the Complaint because they are not true.

38. The Defendants neither admit nor deny the allegations contained in paragraph 38 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

39. The Defendants deny the allegations that they benefitted from “participating” in the Beauty Search Partners’ exploitation of the Plaintiffs because it is not true. The Defendants

never received any compensation or kickbacks from Beauty Search Partners. Rose Talent received money from the club owners only. The Defendants neither admit nor deny the allegations contained in paragraph 39 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

40. The Defendants deny the allegations contained in paragraph 40 of the Complaint because they are not true.

41. The Defendants deny the allegations contained in paragraph 41 of the Complaint because they are not true.

42. The Defendants neither admit nor deny the allegations contained in paragraph 42 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

43. The Defendants neither admit nor deny the allegations contained in paragraph 43 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

44. The Defendants neither admit nor deny the allegations contained in paragraph 44 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

45. The Defendants neither admit nor deny the allegations contained in paragraph 45 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

46. The Defendants neither admit nor deny the allegations contained in paragraph 46 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

47. The Defendants neither admit nor deny the allegations contained in paragraph 47 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

48. The Defendants neither admit nor deny the allegations contained in paragraph 48 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

49. The Defendants neither admit nor deny the allegations contained in paragraph 49 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

50. The Defendants neither admit nor deny the allegations contained in paragraph 50 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

51. The Defendants neither admit nor deny the allegations contained in paragraph 51 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

52. The Defendants neither admit nor deny the allegations contained in paragraph 52 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

53. The Defendants neither admit nor deny the allegations contained in paragraph 53 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

54. The Defendants neither admit nor deny the allegations contained in paragraph 54 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

55. The Defendants neither admit nor deny the allegations contained in paragraph 55 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

56. The Defendants neither admit nor deny the allegations contained in paragraph 56 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

57. The Defendants neither admit nor deny the allegations contained in paragraph 57 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

58. The Defendants neither admit nor deny the allegations contained in paragraph 58 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

59. The Defendants neither admit nor deny the allegations contained in paragraph 59 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

60. The Defendants neither admit nor deny the allegations contained in paragraph 60 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

61. The Defendants neither admit nor deny the allegations contained in paragraph 61 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

62. The Defendants neither admit nor deny the allegations contained in paragraph 62 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

63. The Defendants neither admit nor deny the allegations contained in paragraph 63 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

64. The Defendants neither admit nor deny the allegations contained in paragraph 64 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

65. The Defendants neither admit nor deny the allegations contained in paragraph 65 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

66. The Defendants neither admit nor deny the allegations contained in paragraph 66 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

67. The Defendants neither admit nor deny the allegations contained in paragraph 67 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

68. The Defendants neither admit nor deny the allegations contained in paragraph 68 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

69. The Defendants neither admit nor deny the allegations contained in paragraph 69 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

70. The Defendants neither admit nor deny the allegations contained in paragraph 70 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

71. The Defendants neither admit nor deny the allegations contained in paragraph 71 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

72. The Defendants neither admit nor deny the allegations contained in paragraph 72 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

73. The Defendants neither admit nor deny the allegations contained in paragraph 73 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

74. The Defendants neither admit nor deny the allegations contained in paragraph 74 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

75. The Defendants neither admit nor deny the allegations contained in paragraph 75 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

76. The Defendants neither admit nor deny the allegations contained in paragraph 76 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

77. The Defendants neither admit nor deny the allegations contained in paragraph 77 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

78. The Defendants neither admit nor deny the allegations contained in paragraph 78 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

79. The Defendants neither admit nor deny the allegations contained in paragraph 79 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

80. The Defendants neither admit nor deny the allegations contained in paragraph 80 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

81. The Defendants neither admit nor deny the allegations contained in paragraph 81 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

82. The Defendants neither admit nor deny the allegations contained in paragraph 82 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

83. The Defendants neither admit nor deny the allegations contained in paragraph 83 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

84. The Defendants neither admit nor deny the allegations contained in paragraph 84 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

85. The Defendants neither admit nor deny the allegations contained in paragraph 85 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

86. The Defendants neither admit nor deny the allegations contained in paragraph 86 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

87. The Defendants neither admit nor deny the allegations contained in paragraph 87 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

88. The Defendants neither admit nor deny the allegations contained in paragraph 88 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

89. The Defendants neither admit nor deny the allegations contained in paragraph 89 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

90. The Defendants neither admit nor deny the allegations contained in paragraph 90 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

91. The Defendants neither admit nor deny the allegations contained in paragraph 91 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

92. The Defendants neither admit nor deny the allegations contained in paragraph 92 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

93. The Defendants neither admit nor deny the allegations contained in paragraph 93 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

94. The Defendants neither admit nor deny the allegations contained in paragraph 94 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

95. The Defendants neither admit nor deny the allegations contained in paragraph 95 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

96. The Defendants neither admit nor deny the allegations contained in paragraph 96 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

97. The Defendants neither admit nor deny the allegations contained in paragraph 97 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

98. The Defendants neither admit nor deny the allegations contained in paragraph 98 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

99. The Defendants neither admit nor deny the allegations contained in paragraph 99 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

100. The Defendants neither admit nor deny the allegations contained in paragraph 100 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

101. The Defendants neither admit nor deny the allegations contained in paragraph 101 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

102. The Defendants neither admit nor deny the allegations contained in paragraph 102 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

103. The Defendants neither admit nor deny the allegations contained in paragraph 103 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

104. The Defendants neither admit nor deny the allegations contained in paragraph 104 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

105. The Defendants neither admit nor deny the allegations contained in paragraph 105 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

106. The Defendants neither admit nor deny the allegations contained in paragraph 106 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

107. The Defendants neither admit nor deny the allegations contained in paragraph 107 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

108. The Defendants neither admit nor deny the allegations contained in paragraph 108 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

109. The Defendants neither admit nor deny the allegations contained in paragraph 109 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

110. The Defendants neither admit nor deny the allegations contained in paragraph 110 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

111. The Defendants neither admit nor deny the allegations contained in paragraph 111 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

112. The Defendants neither admit nor deny the allegations contained in paragraph 112 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

113. The Defendants neither admit nor deny the allegations contained in paragraph 113 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

114. The Defendants neither admit nor deny the allegations contained in paragraph 114 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

115. The Defendants neither admit nor deny the allegations contained in paragraph 115 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

116. The Defendants neither admit nor deny the allegations contained in paragraph 116 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

117. The Defendants neither admit nor deny the allegations contained in paragraph 117 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

118. The Defendants neither admit nor deny the allegations contained in paragraph 118 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

119. The Defendants neither admit nor deny the allegations contained in paragraph 119 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

120. The Defendants neither admit nor deny the allegations contained in paragraph 120 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

121. The Defendants neither admit nor deny the allegations contained in paragraph 121 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

122. The Defendants neither admit nor deny the allegations contained in paragraph 122 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

123. The Defendants neither admit nor deny the allegations contained in paragraph 123 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

124. The Defendants neither admit nor deny the allegations contained in paragraph 124 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

125. The Defendants neither admit nor deny the allegations contained in paragraph 125 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

126. The Defendants neither admit nor deny the allegations contained in paragraph 126 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

127. The Defendants neither admit nor deny the allegations contained in paragraph 127 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

128. The Defendants neither admit nor deny the allegations contained in paragraph 128 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

129. The Defendants neither admit nor deny the allegations contained in paragraph 129 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

130. The Defendants neither admit nor deny the allegations contained in paragraph 130 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

131. The Defendants neither admit nor deny the allegations contained in paragraph 131 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

132. The Defendants neither admit nor deny the allegations contained in paragraph 132 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

133. The Defendants neither admit nor deny the allegations contained in paragraph 133 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

134. The Defendants neither admit nor deny the allegations contained in paragraph 134 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

135. The Defendants neither admit nor deny the allegations contained in paragraph 135 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

FIRST CAUSE OF ACTION: FORCED LABOR AGAINST ALL DEFENDANTS

136. The Defendants incorporate each of their responses from paragraph 1 through 135 above as though fully set forth herein.

137. The Defendants neither admit nor deny the allegations contained in paragraph 137 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

138. The Defendants neither admit nor deny the allegations contained in paragraph 138 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

139. The Defendants deny the allegations contained in paragraph 139 of the Complaint because they are not true.

140. The Defendants neither admit nor deny the allegations contained in paragraph 140 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

141. The Defendants deny the allegations contained in paragraph 141 of the Complaint because they are not true.

142. The Defendants deny the allegations contained in paragraph 142 of the Complaint because they are not true.

143. The Defendants neither admit nor deny the allegations contained in paragraph 143 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

144. The Defendants neither admit nor deny the allegations contained in paragraph 144 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

145. The Defendants neither admit nor deny the allegations contained in paragraph 145 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

WHEREFORE, the Defendants respectfully request that this Honorable Court dismiss the Defendants and award them their costs, interest and attorney fees necessitated by having to respond to it.

**SECOND CAUSE OF ACTION: SEX
TRAFFICKING BY FORCE, FRAUD OR COERCION**

146. The Defendants incorporate each of their responses from paragraph 1 through 145 above as though fully set forth herein.

147. The Defendants neither admit nor deny the allegations contained in paragraph 147 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

148. The Defendants deny the allegations contained in paragraph 148 of the Complaint because they are not true.

149. The Defendants neither admit nor deny the allegations contained in paragraph 149 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

150. The Defendants neither admit nor deny the allegations contained in paragraph 150 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

151. The Defendants deny the allegations contained in paragraph 151 of the Complaint because they are not true.

152. The Defendants neither admit nor deny the allegations contained in paragraph 152 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

153. The Defendants neither admit nor deny the allegations contained in paragraph 153 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

154. The Defendants neither admit nor deny the allegations contained in paragraph 154 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

WHEREFORE, the Defendants respectfully request that this Honorable Court dismiss the Defendants and award them their costs, interest and attorney fees necessitated by having to respond to it.

**THIRD CAUSE OF ACTION: TRAFFICKING WITH RESPECT TO
PEONAGE, SLAVERY, INVOLUNTARY SERVITUDE**

155. The Defendants incorporate each of their responses from paragraph 1 through 154 above as though fully set forth herein.

156. The Defendants neither admit nor deny the allegations contained in paragraph 156 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

157. The Defendants neither admit nor deny the allegations contained in paragraph 157 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

158. The Defendants neither admit nor deny the allegations contained in paragraph 158 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

159. The Defendants neither admit nor deny the allegations contained in paragraph 159 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

160. The Defendants neither admit nor deny the allegations contained in paragraph 160 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

161. The Defendants neither admit nor deny the allegations contained in paragraph 161 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

162. The Defendants neither admit nor deny the allegations contained in paragraph 162 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

WHEREFORE, the Defendants respectfully request that this Honorable Court dismiss the Defendants and award them their costs, interest and attorney fees necessitated by having to respond to it.

**FOURTH CAUSE OF ACTION: AIDING AND
ABETTING VIOLATIONS OF FORCED LABOR**

163. The Defendants incorporate each of their responses from paragraph 1 through 162 above as though fully set forth herein.

164. The Defendants neither admit nor deny the allegations contained in paragraph 164 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

165. The Defendants deny the allegations contained in paragraph 165 of the Complaint because they are not true.

166. The Defendants neither admit nor deny the allegations contained in paragraph 166 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

167. The Defendants deny the allegations contained in paragraph 167 of the Complaint because they are not true.

168. The Defendants neither admit nor deny the allegations contained in paragraph 168 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

169. The Defendants neither admit nor deny the allegations contained in paragraph 169 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

WHEREFORE, the Defendants respectfully request that this Honorable Court dismiss the Defendants and award them their costs, interest and attorney fees necessitated by having to respond to it.

**FIFTH CAUSE OF ACTION: AIDING AND ABETTING VIOLATIONS OF SEX
TRAFFICKING BY FORCE, FRAUD OR COERCION**

170. The Defendants incorporate each of their responses from paragraph 1 through 169 above as though fully set forth herein.

171. The Defendants neither admit nor deny the allegations contained in paragraph 171 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

172. The Defendants deny the allegations contained in paragraph 172 of the Complaint because they are not true.

173. The Defendants neither admit nor deny the allegations contained in paragraph 173 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

174. The Defendants deny the allegations contained in paragraph 174 of the Complaint because they are not true.

175. The Defendants deny the allegations contained in paragraph 175 of the Complaint because they are not true.

176. The Defendants neither admit nor deny the allegations contained in paragraph 176 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

177. The Defendants neither admit nor deny the allegations contained in paragraph 177 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

WHEREFORE, the Defendants respectfully request that this Honorable Court dismiss the Defendants and award them their costs, interest and attorney fees necessitated by having to respond to it.

**SIXTH CAUSE OF ACTION: AIDING AND ABETTING VIOLATIONS
OF TRAFFICKING WITH RESPECT TO PEONAGE, SLAVERY,
INVOLUNTARY SERVITUDE OR FORCED LABOR**

178. The Defendants incorporate each of their responses from paragraph 1 through 177 above as though fully set forth herein.

179. The Defendants deny the allegations contained in paragraph 179 of the Complaint because they are not true.

180. The Defendants deny the allegations contained in paragraph 180 of the Complaint because they are not true.

181. The Defendants neither admit nor deny the allegations contained in paragraph 181 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

182. The Defendants deny the allegations contained in paragraph 182 of the Complaint because they are not true.

183. The Defendants deny the allegations contained in paragraph 183 of the Complaint because they are not true.

184. The Defendants neither admit nor deny the allegations contained in paragraph 184 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

185. The Defendants neither admit nor deny the allegations contained in paragraph 185 of the Complaint due to a lack of information sufficient to form a belief and leave the Plaintiffs to their proofs.

WHEREFORE, the Defendants respectfully request that this Honorable Court dismiss the Defendants and award them their costs, interest and attorney fees necessitated by having to respond to it.

AFFIRMATIVE DEFENSES

1. The Plaintiffs have failed to state a claim upon which relief may be granted against the Defendants.

2. The Plaintiffs' claims against the Defendants may be barred by the applicable statute of limitations.

3. The Defendants reserve the right to add additional affirmative defenses as they become known through discovery.

Respectfully submitted,

KENNETH R. BEAMS, PLLC

/s/ Kenneth R. Beams
Kenneth R. Beams (P63248)
Attorney for John Sand and Rose
Talent Agency
2145 Crooks, Ste. 220
Troy, Michigan 48084
(248) 396-3987

Dated: April 9, 2015

CERTIFICATE OF SERVICE

I certify that on April 9, 2015, I electronically filed the foregoing paper with the clerk of the Court using the ECF system and that the paper was served by ECF on all counsel of record.

Dated: April 9, 2015

/s/ Kenneth R. Beams

